

State Water Resources Control Board

October 29, 2018

(Via email and Certified Mail)
CERTIFIED MAIL
NO. 7018 0680 0000 1017 5239

Mr. Tom Bettencourt
Fleet Superintendent
City of Hanford
900 South Tenth Avenue
Hanford, California 93230
tbettencourt@cityofhanfordca.com

**SUBJECT: NOTICE OF VIOLATION; UNDERGROUND STORAGE TANK SYSTEMS
LOCATED AT CITY OF HANFORD YARD, 900 SOUTH TENTH AVENUE,
HANFORD**

Dear Mr. Bettencourt:

As part of an initiative by the State Water Resources Control Board (State Water Board) to ensure compliance at government-owned and/or operated underground storage tank (UST) facilities in California, the State Water Board staff inspected the USTs at your facility on October 23, 2018, pursuant to authority under Health and Safety Code (H&SC), chapter 6.7, section 25289.

The State Water Board has identified the following violations pursuant to H&SC, chapter 6.7, and California Code of Regulations (CCR), title 23, chapter 16:

No.	Violation	Tank	Start Date	Stop Date	Regulation
1	Failure to Maintain Operating Permit Onsite – A copy of the current operating permit was not available at the time of inspection.	All	October 18, 2018	Ongoing	23 CCR 2712(i)
2	Failure to Provide Valid Board of Equalization (BOE) Number – The BOE number listed in CERS is not valid.	All	October 18, 2018	Ongoing	H&SC 25286(c)(9)
3	Failure to Maintain Tank Information – In CERS, under piping type, safe suction is listed; however, conventional suction was observed. Additionally, tank one lists flexible secondary piping; however, fiberglass piping was observed.	All	October 18, 2018	Ongoing	23 CCR 2711(a)

Office of Enforcement | 801 K Street, Suite 2300 | Sacramento, CA 95814 | 916.341.5272

FELICIA MARCUS, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

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No.	Violation	Tank	Start Date	Stop Date	Regulation
4	Failure to Maintain Monitoring Plan – In CERS, under pipe monitoring, suction piping meets exemption criteria lists yes; however, it should list no. Ball valves on product pipe disqualifies safe suction exemption.	All	October 18, 2018	Ongoing	23 CCR 2711(a)(9)
5	Failure to Maintain Plot Plan/Site Map – An approved plot plan/site map indicating the location of the product piping, tanks, and auxiliary equipment with respect to buildings or other landmarks, was not available at the time of the inspection.	All	October 18, 2018	Ongoing	23 CCR 2711(a)(8)
6	Failure to Provide Designated Operator (DO) Training – The DO training record on site indicated June 2, 2017. DO employee training must take place annually.	All	July 1, 2018	Ongoing	23 CCR 2715(c)
7	Failure to Monitor Product Piping – The sensors located inside all piping/fill sumps were not located at the lowest point in the sump. Additionally, the testing boots were attached to the secondary pipe and the testing valves were positioned upward. These configurations prevented the detection of a leak at the earliest opportunity possible. Corrected at the time of inspection.	All	October 18, 2018	October 18, 2018	23 CCR 2630(d)
8	Failure to Tag Monitoring Equipment – A current annual monitoring certification tag was not affixed to the automatic tank gauge at the time of inspection.	All	October 18, 2018	Ongoing	23 CCR 2638(f)
9	Failure to Perform DO Inspections – Prior to October 1, 2018, DO inspections were required monthly. A work order indicates that the November 2017 DO inspection was performed on October 31, 2017.	All	November 1, 2017	November 30, 2017	July 1, 2011; 23 CCR 2715(c)
10	Failure to Perform DO Inspections – Prior to October 1, 2018, DO inspections were required monthly. A work order indicates that the August 2018 DO inspection was performed on July 30, 2018.	All	August 1, 2018	August 31, 2018	July 1, 2011; 23 CCR 2715(c)

You are directed to correct the ongoing violations and submit compliance documentation to the State Water Board and Kings County Environmental Health within sixty (60) days from the date of this letter. Have your DO make specific notations in the next monthly DO report indicating the ongoing violations have been corrected. The monthly DO report and any associated photos must be submitted as proof of compliance.

Please send all compliance documentation to the following:

State Water Board

Mr. Douglas McDevitt
UST Enforcement Unit
Office of Enforcement
State Water Resources Control Board
801 K Street, Suite 2300
Sacramento, California 95814
douglas.mcdevitt@waterboards.ca.gov

Local CUPA

Mr. Lee Johnson
Supervising Environmental Health Officer
Kings County Environmental Health
330 Campus Drive
Hanford, California 93230
lee.johnson@co.kings.ca.us

Pursuant to Health and Safety Code, chapter 6.7, section 25299, the owner and operator of the tank(s) are liable for a penalty of \$500 to \$5,000 per tank, per day of violation. These penalties will continue to accrue until the violations have been corrected.

If you have any questions, please contact me at (916) 341-5891, or by email at matthew.buffleben@waterboards.ca.gov.

Sincerely,



Matthew Buffleben
Supervising Water Resources Control Engineer
Acting Manager, UST Enforcement Unit
Office of Enforcement

cc: *(via email only)*

Mr. Marty Elliot
Lead Fleet Mechanic
City of Hanford
melliot@cityofhanfordca.com

Mr. Lee Johnson
Supervising Environmental Health Officer
Kings County Environmental Health
lee.johnson@co.kings.ca.us

Mr. Luis Flores
Environmental Health Officer IV
Kings County Environmental Health
luis.flores@co.kings.ca.us